EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICE OF OKLAHOMA

MEWBOURNE OIL COMPANY,)	
Plaintiff,)	
v.)	Case No. <u>CIV-24-143-G</u>
YUKON TRADING COMPANY, L.L.C.,)	
Defendant.)	

EXPERT REPORT OF CURTIS D. HORNE, CPL

I, Curtis D. Horne, CPL, have been retained by The Rudnicki Firm in this litigation as an expert witness. My address is 1702 Garden Ivy Lane, Pearland, Texas 77581, and my cell phone number is (281) 389-9635. My findings and opinions on this matter are based on my education, training, knowledge, and experience, as well as pleadings, documents produced and deposition transcripts.

My work is on-going, and I reserve the right to supplement this report with new materials, documents, testimony, and/or information that may be discovered or produced later in this case, to add to this report further analysis of current information, or to address any new claims made by the plaintiff.

All prior cases in which I have offered expert testimony, as well a list of all presentations and seminars I have made in the industry, are included in my CV, which is attached as Exhibit "A." None of my opinions is based in any way on the outcome of this litigation.

To supplement my CV, I am a Certified Professional Landman (#32315) with 43 years of experience in the field. I began my career in Oklahoma in 1981, and worked there through most of 1987, with experience in 44 of the 77 counties. I provided my clients with a full range of field land services, including title search and examination, lease acquisition and title curative, and appeared as a witness in force pooling matters before the Oklahoma Corporation Commission.

I. Materials Reviewed

I have reviewed various materials to supplement my education, experience and knowledge in forming my opinions, and same are listed on Exhibit "B" attached hereto.

II. Rebuttal Opinions

Regarding the opinions put forth in the Summary of Opinions of Dorsey T. Roach, CPL, I offer the following:

Subparagraph "d.": While the protest of a force pooling can result in a delay of the issuance of the final order, said delay is case specific, and can vary from a day to a few weeks to occasionally several months.

Subparagraph "f.": While deadlines for elections made under pooling orders, pre-pooling letter agreements, joint operating agreements and similar orders and agreements certainly can be strictly enforced, I disagree with the assertion that this is standard industry custom and practice. These situations are very case specific, as are the available courses of action. There are often financial situations, such as described in paragraph "g." below, and other situations that must be taken into consideration prior to enforcing a deadline. I do agree that the Operator has the discretion to extend a deadline to make such an election, but is under no obligation to do so.

Subparagraph "h.": I disagree with the assertion that it is industry custom and practice in Oklahoma to treat an Authorization for Expenditure ("AFE") as an invoice, primarily for the reason stated that it does not contain the calculation of the non-operator's share of the amount of expenditure based on their interest in the proposed operation. While the AFE should contain sufficient information to make such a calculation, errors or differences in the calculated amount due could result in under or overpayment of the amount due. Additionally, many if not most agreements specifically stipulate that an invoice be provided.

Subparagraph "i": I have no issue with the first sentence in this paragraph, and Mewbourne may very well have sent Yukon a spud notice on January 8, 2024, but I have seen no conclusive proof that Yukon received said notice, thus I disagree with the conclusions put forth in the remainder of this paragraph.

In his deposition Mr. Roach described a method of sending Certified Mail – Return Receipt Requested through the United States Postal Service that involved a Certified Mail sticker, and claimed to have seen a "green card" return receipt such as this:



In this case however, Mewbourne utilized an online platform called simplecertifiedmail.com to send the letters. It appears that three letters were sent to Yukon using this electronic method, and a copy of a delivery receipt was provided for each letter. However, the signatures on all three receipts appear to be identical, and the party who signed for them has stated that she signed the electronic signature pad that was presented to her only one time.

Additionally, the copies of the letters provided by Mewbourne are dated January 5, 2024 and are designated only as sent "Via Certified Mail", with no corresponding tracking number provided on each letter for identification.

It is my opinion that there is not sufficient evidence to confirm that Yukon actually ever received the specific spud letter that Mewbourne claims to have sent.

Subparagraph "k.": The opinion expressed in this paragraph regarding the reason for a non-operator to claim that they did not receive an election notice is nothing more than speculation that has no basis in fact.

Subparagraph "1.": The conclusions put forth in this paragraph are irrelevant because Yukon did not receive the spud notice. The stated actions of the two non-operators are likewise irrelevant.

Dated: October 30, 2024 Respectfully submitted,

By: /s/ Curtis D. Horne

CURTIS D. HORNE, CPL

1702 Garden Ivy Lane Pearland, Texas 77581 (713) 225-6700

CAREER HISTORY

2021 - Present CONSULTING LANDMAN

Provide oil and gas and geothermal clients with a full range of land services, including cursory lease availability reports, title search and examination, lease acquisition, runsheet preparation, right-of-way acquisition, title curative, due diligence and Texas Railroad Commission research, as well as expert witness services on land related matters.

Since 2008 ENERGY LAND INSTITUTE, Houston, Texas Seminar Developer/Instructor

Develop and present educational seminars for landmen, division order analysts, lease and title analysts, abstractors and other land professionals. Seminars include "Title Curative for the Land Professional" and "Marketable Title: Understanding Runsheets, Title Opinions and Curative".

Since 2003 AMERICAN ASSOCIATION OF PROFESSIONAL LANDMEN, Ft. Worth, TX Seminar Instructor

Present numerous professional development and continuous education seminars around the country on a contract basis, including the CPL/RPL Exam Review. Topics covered include Real Property Law, Title Examination, Contract Law, The Oil & Gas Lease, Title Opinions and Curative, Conveyancing, Interest Calculations, Negotiations and Ethics. Assisted in the development of the Introduction to Field Land Practices and the Principles of Land Practices seminars.

2020 - 2021 PURPLE LAND MANAGEMENT, LLC, Fort Worth and Houston, Texas *Vice President, Business Development – Land Practice*

2016 - 2020 CONSULTING LANDMAN, Houston, Texas

On a contract basis, review leases, unit declarations, contracts, operating agreements, runsheets, title opinions, lease data files, division orders, curative documents and surveys in preparation for drilling allocation wells in the East Texas Haynesville Shale. Order and review supplemental runsheets and title opinions and manage title curative. Provide expert witness services for a variety of land related matters.

2015 - 2016 COURTHOUSEDIRECT.COM, INC., Houston, Texas Business Development Manager

Consulted with clients to provide prospect specific title data packages, as well as access to online title information from numerous county courthouses in Texas. Responsible for developing client relationships and executing business development strategies.

2013 - 2015 PERCHERON ENERGY, LLC, Houston, Texas Vice President, Business Development

Responsible for developing and maintaining client relationships nationwide, while working closely with divisional directors on project management responsibilities and helping execute business development strategies.

1994 - 2013 CURTIS D. HORNE & ASSOCIATES, Houston, Texas Petroleum Landman

Provided clients with a full range of land services, including cursory lease availability reports, title search and examination, lease acquisition, seismic permit and option negotiation, runsheet preparation, right-of-way acquisition, title curative, due diligence and Texas Railroad Commission research. Provided expert witness services on land related matters.

1992 - 1994 COMMONWEALTH LAND TITLE INSURANCE COMPANY, Dallas, Texas Assistant Title Operations Manager

Responsible for staffing and daily supervision of all departments of abstract plant operations, including order entry, micrographics, abstracting, title examination and legal. Examined title for high liability transactions and consulted with counsel regarding underwriting decisions. Worked closely with escrow officers to satisfy curative requirements and resolve title issues. Planned and conducted weekly training sessions for title abstractors and examiners. Approved residential and commercial surveys.

1981 - 1992 CURTIS D. HORNE & ASSOCIATES Petroleum Landman

Title search and examination, lease acquisition and title curative, with experience in Oklahoma, Texas, Arkansas and Montana. Worked closely with attorneys regarding drill site and division order title opinions. Served as lead broker and crew chief. Appeared as a witness before the Oklahoma Corporation Commission in force pooling matters.

EDUCATION

1975 - 1978 The University of Texas at Austin, Austin, Texas

PROFESSIONAL ASSOCIATIONS

American Association of Professional Landmen (AAPL)

Certified Professional Landman, Number 32315

2018 Best Member Communication Award

2014 TIPRO Texas Top Producers - Best Landman Finalist

2008 Special Award - Education

2007 Best Member Communication Award

2002 Field/Independent Landman Award

Executive Committee - Treasurer (2007-2008)

Member - Legislative and Regulatory Affairs Committee (2015-2020)

Chair Emeritus (2019-2020)

Chairman (2018-2019)

Assistant Chairman (2017-2018)

Member - Publication Committee (2010-2015)

Chairman (2014-2015)

Assistant Chairman (2013-2014)

Member - Annual Meeting Committee (2011-2013)

Chairman (2012-2013)

Assistant Chairman (2011-2012)

Member - Education Committee (2006-2010, 2019)

Member - Ethics Committee (2008-2009)

Chairman (2008-2009)

Member - Certification Committee (2004-2007)

Chairman (2006-2007)

Assistant Chairman (2005-2006)

Member - Field Landman Committee (2003-2006)

Chairman (2005-2006)

Assistant Chairman (2004-2005)

Member - Legislative/Regulatory Committee (2005-2006)

Instructor - Multiple seminars, including the Certified Professional Landman Exam Review

Houston Association of Professional Landmen (HAPL)

Executive Committee - Treasurer (2007-2008)

Member - HAPL Executive Night Committee (2022)

Chairman - HAPL Executive Night Committee (2014)

Chairman - AAPL Awards Committee (2005-2007)

Chairman - Fall Saturday Seminar Committee (2006-2008)

North Houston Association of Professional Landmen (NHAPL)

AAPL Director (2013-2014) President (2012-2013) Vice President (2011-2012) Director (2010-2011)

Permian Basin Landmen's Association

Volunteer - 2016 Eric Hanson Memorial Sporting Clay Shoot

Denver Association of Petroleum Landmen

Volunteer - 4th Annual DAPL Rockies Bash (2016)

West Houston Association of Professional Landmen

AAPL Director (2021-2023)

National Association of Royalty Owners (NARO)

Speaker - 2017 National Convention Speaker - 2015 National Convention

MEMBERSHIPS

St. Helen Catholic Church, Pearland, Texas

Parish Bazaar Chairman (2008)

Parish Co-Chair - Diocesan Capital Campaign (2003-2004)

The Ex-Student's Association of the University of Texas Past Chapter President

INDUSTRY PRESENTATIONS

American Association of Professional Landmen Certified Professional Landman Exam Review

Oklahoma City, Oklahoma - August 31, 2024

Pittsburgh, Pennsylvania - May 15, 2024

Houston, Texas - December 6, 2023

Midland, Texas - November 9, 2022

Fort Worth, Texas - September 21, 2022

Denver, Colorado - March 23, 2022

Midland, Texas - December 14, 2021

Wichita, Kansas - November 9, 2021

Tulsa, Oklahoma - July 13, 2021

Pittsburgh, Pennsylvania - May 11, 2021

Fort Worth, Texas - September 15, 2020 (Videotaping)

Denver, Colorado - July 16, 2019

Pittsburgh, Pennsylvania - May 14, 2019

Oklahoma City, Oklahoma - March 5, 2019

Pittsburgh, Pennsylvania - May 15, 2018

Denver, Colorado - July 11, 2017

Pittsburgh, Pennsylvania - May 2, 2017

Oklahoma City, Oklahoma - November 8, 2016

Denver, Colorado - July 19, 2016

Pittsburgh, Pennsylvania - May 17, 2016

Shreveport, Louisiana - April 12, 2016

Dallas, Texas - March 1, 2016

Tulsa, Oklahoma - February 16, 2016

Midland, Texas - January 26, 2016

Fort Worth, Texas - November 10, 2015

Houston, Texas - September 1, 2015

Lafayette, Louisiana - May 13, 2015

Dallas, Texas - March 24, 2015

Tulsa, Oklahoma - February 17, 2015

Houston, Texas - September 9, 2014

Denver, Colorado - July 14, 2014

Pittsburgh, Pennsylvania - June 4, 2014

San Antonio, Texas - March 19, 2014

Tulsa, Oklahoma - February 25, 2014

Midland, Texas - January 21, 2014

Grand Rapids, Michigan - October 16, 2013

Oklahoma City, Oklahoma - September 25, 2013

Washington, Pennsylvania - April 16, 2013

Tulsa, Oklahoma - January 23, 2013

San Antonio, Texas - August 7, 2012

Oklahoma City, Oklahoma - July 17, 2012

Denver, Colorado - September 27, 2011

Oklahoma City, Oklahoma - July 12, 2011

Pittsburgh, Pennsylvania - March 22, 2011

Fort Worth, Texas - January 25, 2011

The Woodlands, Texas - May 18, 2010

Denver, Colorado - October 20, 2009

Fort Worth, Texas - March 3, 2009

Denver, Colorado - October 21, 2008

Oklahoma City, Oklahoma - July 8, 2008

Denver, Colorado - October 30, 2007

The Woodlands, Texas - May 8, 2007

Lansing, Michigan - April 24, 2007

Fort Worth, Texas - November 8, 2006

Denver, Colorado - October 3, 2006

Oklahoma City, Oklahoma - July 12, 2006

The Woodlands, Texas - May 16, 2006

Wichita, Kansas - April 18, 2006

Fort Worth, Texas - November 9, 2005

Midland, Texas - March 30, 2005

The Woodlands, Texas - February 15, 2005

Denver, Colorado - October 5, 2004

Billings, Montana - August 11, 2004

Houston, Texas - May 4, 2004

New Orleans, Louisiana - April 14, 2004

Fort Worth, Texas - November 12, 2003

Columbus, Ohio - October 28, 2003

Denver, Colorado - August 19, 2003

The Woodlands, Texas - May 13, 2003

Topics: Real Property Law, Contract Law, Conveyancing, Legal Descriptions, Interest Calculations, The Oil & Gas Lease, Ethics

American Association of Professional Landmen

Fundamentals of Land Practices and Registered Professional Landman Exam Review

Morgantown, West Virginia - December 4, 2018

Oklahoma City, Oklahoma - October 23, 2018

Denver, Colorado - April 20, 2015

Oklahoma City, Oklahoma - November 20, 2014

Denver, Colorado - October 6, 2014

Denver, Colorado - February 1, 2013

Williamsport, Pennsylvania - December 6, 2012

New Orleans, Louisiana - September 7, 2012

Casper, Wyoming - August 27, 2012

Houston, Texas - January 12, 2012

Lubbock, Texas - April 11, 2011

Billings, Montana - March 1, 2011

Fort Worth, Texas - August 4, 2009

Lansing, Michigan - April 30, 2009

San Antonio, Texas - March 26, 2009

Abingdon, Virginia - December 4, 2008

Topics: Real Property Law, Land Descriptions, Contract Law, Conveyancing, Interest Calculations, The Oil & Gas Lease, Ethics

American Association of Professional Landmen

Marketable Title: Understanding Runsheets, Title Opinions and Curative

Oklahoma City, Oklahoma - June 7, 2016

Grand Rapids, Michigan - April 28, 2016

Pittsburgh, Pennsylvania - March 31, 2016

Houston, Texas - November 19, 2015

Fort Worth, Texas - October 7, 2015

Midland, Texas - August 25, 2015

American Association of Professional Landmen

Principles of Land Practices Seminar

Wichita, Kansas - February 3-4, 2015

Houston, Texas - January 10-11, 2013

Tulsa, Oklahoma - July 30-31, 2012

Pittsburgh, Pennsylvania - May 3-4, 2012

Charleston, West Virginia - May 5-6, 2011

Pittsburgh, Pennsylvania - July 16-17, 2009

Bismarck, North Dakota - May 18-19, 2009

Topics: Real Property Law, Land Descriptions, Contract Law, Conveyancing, Interest Calculations, The Oil & Gas Lease, Navigating the Courthouse and Abstract Plant, Negotiation, Document Preparation and Execution, Internet Resources, Ethics

American Association of Professional Landmen Applied Land Practices Seminar

Washington, Pennsylvania - August 4, 2014

Casper, Wyoming - July 21, 2014

Billings, Montana - May 1, 2014

Fort Worth, Texas - July 19, 2013

San Antonio, Texas - February 9, 2012

Traverse City, Michigan - October 28, 2011

Billings, Montana - July 7, 2011

Topics: Running Title (Navigating the Courthouse and Abstract Plant), Negotiation and the Landman, Document Preparation, The Lease Purchase Report Package, Runsheet Preparation, Title Opinions and Curative, Ethics Discussion, The Landman and the Industry

American Association of Professional Landmen Introduction to Field Land Practices Seminar

Wichita, Kansas - February 3-4, 2015

Clarksburg, West Virginia - May 19-20, 2014

Boardman, Ohio - February 27-28, 2014

Evansville, Indiana - May 8-9, 2013

Canton, Ohio - February 26-27, 2013

Zanesville, Ohio - March 8-9, 2012

San Antonio, Texas - March 1-2, 2012

Midland, Texas - November 17-18, 2011

Fort Worth, Texas - January 14-15, 2009

Oklahoma City, Oklahoma - September 25-26, 2008

Billings, Montana - August 21-22, 2008

Pittsburgh, Pennsylvania - April 17-18, 2008

Houston, Texas - March 17-18, 2008

Charleston, West Virginia - November 7-8, 2007

Fort Worth, Texas - September 27-28, 2007

Norman, Oklahoma - July 12-13, 2007

Houston, Texas - June 28-29, 2007

San Antonio, Texas - March 22-23, 2007

Houston, Texas - January 25-26, 2007

Fort Worth, Texas - November 16-17, 2006

Topics: Real Property Law, Land Descriptions, Contract Law, Conveyancing, Interest Calculations, The Oil & Gas Lease, Navigating the Courthouse and Abstract Plant, Negotiation, Document Preparation and Execution, Internet Resources, Ethics

American Association of Professional Landmen

Southwest Land Institute

Dallas, Texas - April 16, 2009

Ethics for the Petroleum Landman – Ride for the Brand

American Association of Professional Landmen Annual Membership Meeting

Boston, Massachusetts – June 20-21, 2024

Landmen, Chatbots and Ethics – Oh, My!

Pittsburgh, Pennsylvania - June 21-22, 2018

Components of Negotiation

Orlando, Florida - June 18, 2016

Landmen, Ethics and the Unauthorized Practice of Law

Washington, D.C. - June 8, 2013

Field Land Work - Then and Now

Clearwater, Florida - June 17, 2009

Negotiation and the Petroleum Landman

American Association of Professional Landmen Appalachian Land Institute

Washington, Pennsylvania - October 6-7, 2016

Landmen, Ethics and the Unauthorized Practice of Law

Washington, Pennsylvania - October 1-2, 2015

Understanding Runsheet Preparation

Washington, Pennsylvania - September 2-3, 2014

Title Curative for the Land Professional

American Association of Professional Landmen Texas Land Institute

Houston, Texas - September 11, 2012

Negotiation and the Petroleum Landman

Houston, Texas - November 3, 2009

Title Curative for the Land Professional

Houston, Texas - September 11, 2007

Runsheet Preparation

Ethics Discussion - Moderator

Houston, Texas - September 25, 2002

Ethics Panelist

American Association of Professional Landmen

Next Generation Landman's Institute

Flower Mound, Texas - April 11, 2008

Title Curative for the Field Landman

Grapevine, Texas - April 20, 2007

Negotiation and the Petroleum Landman

Las Colinas, Texas - April 24, 2006

Runsheet Preparation for the Field Landman

Houston, Texas - April 22, 2005

Title Curative for the Field Landman

American Association of Professional Landmen Basic Land Practices Seminar

Elmira, New York - April 11-12, 2005

Houston, Texas - October 21-22, 2004

Norman, Oklahoma - March 4-5, 2004

Topics: Real Property Law, Land Descriptions, Contract Law, Conveyancing, Interest Calculations, The Oil & Gas Lease, Navigating the Courthouse and Abstract Plant, Title Opinions and Curative, Document Preparation and Execution

University of Houston - Downtown

Petroleum Land Management Certificate Program

Houston, Texas - May 10-11, 2007

Topics: Real Property Law, Land Descriptions, Contract Law, Conveyancing, Interest Calculations, The Oil & Gas Lease, Running Title

American Association of Professional Landmen Field Landman Seminar

Houston, Texas - March 21, 2018

Landmen, Ethics and the Unauthorized Practice of Law

Austin, Texas - December 4, 2014

Ethics 360

Evansville, Indiana - May 24, 2012

Landmen, Ethics and the Unauthorized Practice of Law

Austin, Texas – November 3, 2011

Title Curative for the Field Landman

Traverse City, Michigan - October 27, 2011

Landmen, Ethics and the Unauthorized Practice of Law

Austin, Texas - March 26, 2008

Runsheet Preparation for the Field Landman

Decatur, Texas - March 28, 2006

Title Curative for the Field Landman

Fort Worth, Texas - November 11, 2004

Energy Land Institute

The Oil and Gas Lease for the Land Professional

Houston, Texas - January 29, 2009

Energy Land Institute

Title Curative for the Land Professional

San Antonio, Texas - October 25, 2012

Houston, Texas - April 24, 2012

San Antonio, Texas - May 26, 2011

Houston, Texas - October 30, 2008

Houston, Texas - August 28, 2008

Houston, Texas - June 26, 2008

Houston, Texas - May 1, 2008

Canadian Association of Petroleum Landmen 33rd Annual Conference

Quebec City, Quebec, Canada - September 25, 2011 United States Land Descriptions Title Curative for the Land Professional

Denver Association of Petroleum Landmen Annual Fall Seminar

Denver, Colorado - October 27, 2015 Landmen, Ethics and the Unauthorized Practice of Law

Wyoming Association of Professional Landmen Annual Meeting & Seminar

Casper, Wyoming - June 3, 2011
Ethics and the Petroleum Landman
Ethics Discussion - Moderator

Houston Association of Professional Landmen 54th Annual Technical Workshop

The Woodlands, Texas – April 18, 2023

Everything You Need to Know You Learned in Kindergarten

Fall Saturday Seminar

Houston, Texas - November 4, 2006 Negotiation and the Petroleum Landman Ethics Discussion - Moderator

North Houston Association of Professional Landmen

Membership Luncheon - October 13, 2011

Landmen, Ethics and the Unauthorized Practice of Law

Membership Luncheon - March 12, 2009

Title Curative for the Land Professional

Membership Luncheon - September 14, 2006

The Lost Generation of Landmen

North Houston Association of Professional Landmen Half Day Seminar

The Woodlands, Texas - February 8, 2007 *Negotiation and the Petroleum Landman*

San Antonio Association of Professional Landmen Annual Mid-Winter Seminar

San Antonio, Texas - February 17, 2007 Runsheet Preparation for the Field Landman

Ark-La-Tex Association of Professional Landmen Annual Educational Seminar

Shreveport, Louisiana - February 10-11, 2006 *Title Curative for the Field Landman* Shreveport, Louisiana - February 11-12, 2005 *Ethics Discussion - Moderator*

GE Energy Financial Services Basic Land Practices Seminar

Stamford, Connecticut - May 7, 2004

Topics: Real Property Law, Land Descriptions, Contract Law, Conveyancing, Interest Calculations, The Oil & Gas Lease, Navigating the Courthouse and Abstract Plant, Title Opinions and Curative

National Association of Lease and Title Analysts 2019 NALTA Conference

Westminster, Colorado – August 28-30, 2019

Marketable Title: Understanding Runsheets, Title Opinions, Curative and More

Ethics: Everything You Need to Know You Learned in Sunday School

2016 NALTA Conference

Atlanta, Georgia - September 21-23, 2016

Ethics and the Lease Analyst; Real Property Law for the Land Professional

2014 NALTA Conference

Nashville, Tennessee - September 24-26, 2014

I Am Not a Lawyer, But I Play One on the Telephone (Ethics)

2009 NALTA Conference

Scottsdale, Arizona - September 17-18, 2009

Title Curative for the Lease and Title Analyst

National Association of Division Order Analysts

NADOA 38th Annual Institute

Savannah, Georgia - October 12-14, 2011

Title Issues for the Division Order Analyst

NADOA 36th Annual Institute

Washington, D.C. - September 24-25, 2009

Real Property Law for the Land Professional

NADOA 34th Annual Institute

Albuquerque, New Mexico - October 10-12, 2007

Title Curative for the Division Order Analyst

Association of Lease and Title Analysts - Houston

Membership Luncheon - February 22, 2022

Ethics: Sin is Selfishness

Membership Luncheon - February 24, 2015

I Am Not a Lawyer, But I Play One on the Telephone (Ethics)

Membership Luncheon - April 22, 2014

Title Curative for the Lease and Title Analyst

Membership Luncheon - February 24, 2009

Ethics and the Lease and Title Analyst

Membership Luncheon - June 26, 2007

Title Curative for the Lease and Title Analyst

Houston Association of Division Order Analysts

Membership Luncheon - January 14, 2010

Ethics and the Division Order Analyst

Membership Luncheon - April 5, 2007

Title Curative for the Division Order Analyst

The Association of Desk & Derricks Clubs National Convention Land & Leasing Seminar

Houston, Texas - September 23, 2010

Dallas, Texas - September 24, 2003

Topics: Real Property Law, Contract Law, Conveyancing, The Oil & Gas Lease, Ethics

EXPERT TESTIMONY

United States Bankruptcy Court for the Southern District of Texas Corpus Christi Division Case No. 06-20804

Chapter 11

In re: Reichmann Petroleum Corp., Debtor

United States Bankruptcy Court for the Northern District of Texas

Dallas Division

Case No. 09-35228-BJH

Chapter 11

In re: Cornerstone E&P Company, L.P., et al., Debtors

Adversary No. 09-03447-BJH

Bakers Hughes Oilfield Operations, Inc., et al., Plaintiffs

v.

Union Bank of California, N.A., N/K/A Union Bank, N.A., et al., Defendants

County Civil Court at Law

Number 4

Harris County, Texas

Cause No. 735,465

City of Houston, Plaintiff in Eminent Domain Proceeding

v.

AIC Management, Defendant and Cross-Plaintiff

v.

Rhonda S. Crews, et al., Defendants and Cross-Defendants

v.

Billy G. Baker, Defendant and Cross-Defendant/Cross-Plaintiff

V.

Aldine Independent School District, Intervenor and Cross-Defendant

124thnd Judicial District Court of Gregg County, Texas

Cause No. 2008-1779-B

Annie Dickey Taylor and Armanda Roberson

v.

Chinn Exploration Company

82nd Judicial District Court of Robertson County, Texas Cause No. 08-12-18,265-CV Midway Land Development, Inc.

Encana Oil & Gas (USA), Inc.

71st Judicial District Court of Harrison County, Texas Cause No. 11-0849 Noel Diane Jones, et al.

Petrohawk Properties, L.P. and P-H Energy, L.L.C.

United States District Court for the Eastern District of Texas Lufkin Division Cause No. 9:12CV2 Carleton Adams, et al., Plaintiffs Chesapeake Exploration, L.L.C., Defendant

United States District Court for the Southern District of Texas **Houston Division** Civil Action No. H-11-601 **Prospect Capital Corporation**

Michael Enmon, The Enmon Irrevocable Family Trust, Kari Enmon, Grace W. Enmon, Kickapoo Kennels, LLC and James Van Meter, as Trustee of The Enmon Irrevocable Family Trust

44th Judicial District Court of Dallas County, Texas Cause No. DC-12-05303 Orca Assets, G.P., L.L.C.

J.P. Morgan Chase Bank, N.A., J.P. Morgan Chase Bank, N.A., as Trustee of the Red Crest Trust, Phillip Mettham, Andy J. McMullen, John H. McMullen, Jr., Margie Harris Newton and Cynthia Carole Beard

In the Matter of the Arbitration Between Hanwha Resources (USA) Plaintiffs v. Ryan C. Hoerauf, Individually, *et al.* Defendants

141st Judicial Court of Tarrant County, Texas Cause No. 141-290089-17
Penn Investment Funds, LLC, Plaintiff Antero Resources Corporation, Intervenor v.
Braxton Energy, LLC,
Braxton Acquisitions, LLC,
Braxton Minerals II, LLC,
Robert Scott Bauer, John
Bradley Ashburn, Michael
Fisher, Maegen Fisher, M&M
Consulting, et al., Defendants

419th District Court of Travis County, Texas Case No. D-1-GN-23-000019 Stronghold Management Services, LLC v. Enverus, Inc, *et al.*

270th Judicial District Court of Harris County, Texas Cause No. 2022-27971 Oil Projects, LLC v. Great American Insurance Company and Anejo Production LLC

District of Columbia Superior Court - Civil Division Civil Action No. 2022 CA 001375B 220 Hamilton Street, LLC v. Chicago Title Insurance Company Premium Title & Escrow Company Daniel D. Smith, d/b/a Document Services

WDOK No. CIV-24-143-G

Yukon Expert - Curt Horne, CPL

Documents Provided to Curt Horne by TRF

Description	Identifier
Summary of Opinions of Dorsey T. Roach, CPL	
Notice of Deposition and Subpoena Duces Tecum	
Excel Spreadsheets of Documents used for Roach Deposition	
MOC Complaint, DKT 01 - Filed 2/7/2024	
/ukon Answer & Counterclaims, DKt 06 - Filed 4/25/2024	
Affidavit of Dorsey Roach attached as Exhibit 4 to MOC's MPSJ filed in Yukon v MOC, Custer	
County, No CV-2023-106 (Collins-Baker)	
Section 1 Letter Agreement dated 9/29/21.	YUKON_Abernathy_000072-79
OCC Section 1 Pooling Order, No. 722379 in Cause No. CD 202101063, dated 12/28/21.	YUKON_Abernathy_000060-71
	YUKON_Abernathy_000263-000269
.7N-19W, Dewey County.	VIIVON Abornothy 000086 06
section 1, 2 and 12 Letter Agreement dated 10/31/23 with Exhibits A (Section 12 Letter	YUKON_Abernathy_000086-96
Agreement) and B (Section 35 Letter Agreement).	MOC Abornothy 000170 000184
2023-11-01_927am_McDougall_Shepherd_RE- Sections 1, 2, 12-13N-17W and 35-14N-17W.pdf	MOC_Abernathy_000179-000184
2023-11-01_929am_Shepherd_McDougall_RE- Sections 1, 2, 12-13N-17W and 35-14N-17W.pdf	MOC_Abernathy_000185-191
2023-11-01_940am_McDougall_Shepherd_RE- Sections 1, 2, 12-13N-17W and 35-14N-17W.pdf	MOC_Abernathy_000192-000198
OCC Section 12 Pooling Order No. 738501 in Cause No. CD 2023-002067, dated 11/20/23.	YUKON_Abernathy_000138-149
Email re Haggard 2/35 MD 1H well.	YUKON_Abernathy_000205-000208
etter from Yukon to MOC dated 12/8/23 re Pooling Order No. 738501, Abernathy 1_12 CN 2H.	MOC_Abernathy_000017
Email string (Giffhorn, McDougall, Edwards) (12/13/23 - 1/4/24).	YUKON_Abernathy_000230-231
etter from MOC to Yukon dated 12/22/23 re Abernathy 1/12 CN 2H.	MOC_Abernathy_000139-140
letter from JSR to Mewbourne dated December 29, 2023 re Abernathy 1/12 CN #2H.	MOC_Abernathy_000226-000227
letter from SPIR to Mewbourne dated December 29, 2023 re Abernathy 1/12 CN #2H Well.	MOC_Abernathy_000224-000225
2024-01-05 Overlay Letter to Yukon and Proof of Delivery on 01-10-2024 (14 15 20 Consent).	MOC_Abernathy_000205-000210
2024-01-05 Overlay Letter to Sawtooth and Proof of Delivery on 01-10-2024 (14 15 20 Consent).	MOC_Abernathy_000211-000216
2024-01-05 Overlay Letter to Zephyr Resources and Unclaimed Env (14 15 20 Consent).	MOC_Abernathy_000217-000223
mail from Giffhorn to McDougall dated 1/8/24.	YUKON_Abernathy_000007
MOC letter to Yukon dated 1/8/24 re Abernathy 1/12 CN 2H well.	YUKON_Abernathy_000014
024-01-08 Spud Notice Letter to Yukon.	MOC_Abernathy_000200-000204
MOC Letter to Yukon dated 1/8/24 re Abernathy 1/12.	YUKON_Abernathy_000049
SPS Simple Certified dated 1/10/24.	YUKON_Abernathy_000017
mail string (Giffhorn, McDougall, Edwards) (1/18/24 - 1/24/24) re PO 738501.	YUKON_Abernathy_000107-110
mail string (Giffhorn, McDougall, Edwards) (1/18/24 - 1/31/24) re USPS Proof of Delivery.	YUKON_Abernathy_000015
Email string (Giffhorn, McDougall, Edwards) (1/18/24 - 2/1/24) re 30-day spud notice on Abernathy	YUKON_Abernathy_000011
L/12 CN #2H well. Email attaching correspondence re Abernathy 1/12 CN 2H Well.	YUKON_Abernathy_000215-000216

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Yukon Expert - Curt Horne, CPL

Documents Provided to Curt Horne by TRF

Description	Identifier
RE: Camargo Ranch 2/35 MD #5HS, Sections 2-17N-19W and 35-18N-19W, Dewey County,	YUKON_Abernathy_000468-000470
Oklahoma	
FW: [EXT] RE: Camargo Ranch 2/35 MD #5HS, Sections 2-17N-19W and 35-18N-19W, Dewey	YUKON_Abernathy_000467
County, Oklahoma	
Video of Dorsey Roach Deposition	
Transcript of Dorsey Roach Deposition and Combined Exhibits 1-24	
Timeline and Timeline Documents (listed below)	
Timeline Document	MOC_Abernathy_000001-000008
Timeline Document	MOC_Abernathy_000044-000055
Timeline Document	MOC_Abernathy_000039-000040
Timeline Document	YUKON_Abernathy_000263-000269
Timeline Document	YUKON_Abernathy_000086-000096
Timeline Document	MOC_Abernathy_000167-000170
Timeline Document	MOC_Abernathy_000179-000184
Timeline Document	MOC_Abernathy_000185-000191
Timeline Document	MOC_Abernathy_000192-000198
Timeline Document	MOC_Abernathy_000071-000082
Timeline Document	YUKON_Abernathy_000205-000208
Timeline Document	MOC_Abernathy_000017
Timeline Document	YUKON_Abernathy_000230-000231
Timeline Document	MOC_Abernathy_000139-000140
Timeline Document	MOC_Abernathy_000226-000227
Timeline Document	MOC_Abernathy_000224-000225
Timeline Document	Yukon_Abernathy_000026-000027
Timeline Document	MOC_Abernathy_000205-000210
Timeline Document	MOC_Abernathy_000211-000216
Timeline Document	MOC_Abernathy_000217-000223
Timeline Document	YUKON_Abernathy_000014
Timeline Document	Yukon_Abernathy_000006
Timeline Document	MOC_Abernathy_000200-000204
Timeline Document	YUKON_Abernathy_000017
Timeline Document	Yukon_Abernathy_000006
Timeline Document	Yukon_Abernathy_000002-000003
Timeline Document	YUKON_Abernathy_000107-000110
Timeline Document	YUKON_Abernathy_000015-000017
Timeline Document	Yukon_Abernathy_000042
Timeline Document	Yukon_Abernathy_000043-000045
Timeline Document	Yukon_Abernathy_000010
Timeline Document	Yukon_Abernathy_000010
Timeline Document	Yukon_Abernathy_000011-000013
Timeline Document	Yukon_Abernathy_000015-000017
Timeline Document	Yukon_Abernathy_000217
Timeline Document	Yukon_Abernathy_000121-000123
Timeline Document	YUKON_Abernathy_000215-000216
Timeline Document	Yukon_Abernathy_000009
Timeline Document	ABERNATHY 1_12 CN 2H_Permit to
Timeline Document	ABERNATHY 1 12 CN 2H Notification of
	Well Spud

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Yukon Expert - Curt Horne, CPL

Documents Provided to Curt Horne by TRF

	Description	Identifier
Timeline Document		ABERNATHY 1 12 CN 2H Notification of
		Intention to Plug
Timeline Document		ABERNATHY 1 12 CN 2HR Notification
		of Well Spud
Timeline Document		ABERNATHY 1 12 CN 2HR Permit to
		Drill